

CNR/BTK
F. #2016R00009

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U.S. DISTRICT COURT E.D.N.Y.

★ SEP 28 2016 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 846)

JASON JONES,

Defendant.

MJ 16- 874

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BORNSTEIN, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about and between September 12, 2016 and September 26, 2016, within the Eastern District of New York and elsewhere, the defendant JASON JONES, together with others, did knowingly and intentionally conspire to possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II))

The source of your deponent's information and the grounds for his/her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Task Force Officer with the Drug Enforcement Administration (“DEA”) and have been involved in the investigation of numerous cases involving cocaine trafficking on Long Island. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants’ criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about September 12, 2016, MATTHEW AICHROTH flew from New York to Los Angeles on JetBlue. Upon his arrival at LAX airport, AICHROTH was observed by law enforcement meeting with the defendant JASON JONES. After JONES met AICHROTH, both JONES and AICHROTH entered a rented 2016 gray Nissan Maxima, bearing Vehicle Identification Number (“VIN”) 1N4AA6AP4GC424098 (the “Subject Rental Car”)—which subpoenaed records show was rented in JONES’s name—and traveled to an apartment leased to AICHROTH’s wife in Santa Monica, California.

3. On September 21, 2016, law enforcement officers observed the Subject Rental Car being loaded on to a car carrier-type tractor trailer in Downey, California.

4. On September 24, 2016, the Subject Rental Car was observed being unloaded from the car carrier at a shipping company lot in North Bergen, New Jersey.

5. On September 26, 2016, AICHROTH and JOHN MONSERRAT were observed leaving AICHROTH’s residence in East Islip, New York together in MONSERRAT’s pickup truck and heading to the shipping company lot where the Subject Rental Car was located. At the lot, AICHROTH attached a Florida dealer license plate on the vehicle and gave MONSERRAT a duffle bag from the Subject Rental Car to place in his pickup

truck. AICHROTH then drove the Subject Rental Car from New Jersey and into the Eastern District of New York, where he was detained by law enforcement in Bay Shore, New York. MONSERRAT drove his pickup truck with the duffle bag into the Eastern District of New York, where he was detained outside of JONES's residence, 90 Peckham Avenue in Islip, New York.

6. Upon contact with law enforcement, MONSERRAT consented to a search of his pickup truck and the duffle bag. Contained in the duffle bag were eleven vacuum sealed bags, each containing a kilogram-sized brick of a compressed white powdery substance. A field-test of the substance demonstrated that it was positive for the presence of cocaine. The total approximate weight of the packaged cocaine was more than five kilograms, an amount of cocaine, which—based upon my training and experience—is consistent with the distribution and sale of cocaine and not with its personal use.

7. MONSERRAT waived his Miranda rights and stated, in sum and substance, that AICHROTH gave him the cocaine at the shipping company lot for delivery to the defendant JASON JONES.

WHEREFORE, your deponent respectfully requests that the defendant JASON JONES, be dealt with according to law.



MICHAEL BORNSTEIN
Task Force Officer, Drug Enforcement
Administration

Sworn to before me this
28th day of September, 2016



/s/ A. Kathleen Tomlinson

THE HONORABLE A. KATHLEEN TOMLINSON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK